

Honorable Edmund Murphy

SUPERIOR COURT OF WASHINGTON FOR PIERCE COUNTY

LARRY C. OCKLETREE, Individually,

NO. 11-2-13029 6

Plaintiff,

NOTICE OF APPEARANCE

v.

FRANCISCAN HEALTH SYSTEM, a
Washington Corporation, d/b/a/ ST. JOSEPH
HOSPITAL; and JOHN and JANE DOE(S) (1-
10),

Defendants.

TO: CLERK OF THE COURT

AND TO: DWAYNE L. CHRISTOPHER, Attorney for Plaintiff

YOU AND EACH OF YOU WILL PLEASE TAKE NOTICE that the above-named defendant, Franciscan Health System, d/b/a St. Joseph Hospital, without waiving objections as to improper service or jurisdiction, hereby enters its appearance for the limited purpose of filing the Notice of Filing of Notice of Removal in the above-entitled action by Williams Kastner & Gibbs PLLC and Sheryl J. Willert. You are hereby requested to serve all further papers and proceedings in said cause, except original process, upon said attorneys at their address below stated.

NOTICE OF APPEARANCE - 1

Williams, Kastner & Gibbs PLLC
601 Union Street, Suite 4100
Seattle, Washington 98101-2380
(206) 628-6600

3267266.1

Exhibit A – 1

1
2 DATED this 11th day of October, 2011.

3 s/Sheryl J. Willert, WSBA #08617
4 Attorneys for Defendant FRANCISCAN
HEALTH SYSTEM
5 WILLIAMS, KASTNER & GIBBS PLLC
6 601 Union Street, Suite 4100
Seattle, WA 98101-2380
7 Telephone: (206) 628-6600
Fax: (206) 628-6611
8 Email: swillert@williamskastner.com
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

NOTICE OF APPEARANCE - 2

Williams, Kastner & Gibbs PLLC
601 Union Street, Suite 4100
Seattle, Washington 98101-2380
(206) 628-6600

3267266.1

CERTIFICATE OF SERVICE

The undersigned certifies under penalty of perjury under the laws of the State of Washington that on the date specified below, I filed the foregoing electronically with the Clerk of the Court and a sent a true and correct copy of the foregoing via electronic mail and ABC legal messenger to counsel of record for Plaintiff Larry C. Ockletree at the following address:

Counsel for Plaintiff

Dwayne L. Christopher, PLLC
Attorney at Law
4008 S Pine St
Tacoma, WA 98409
T: 253.223.9489
F: 253.566.0129
E:

☒ ECF / Email
☐ U.S. Mail
☒ Legal Messenger
☐ Facsimile

DATED this 11th day of October, 2011.

s/Sheryl J. Willert, WSBA #08617
Attorneys for Defendant FRANCISCAN
HEALTH SYSTEM
WILLIAMS, KASTNER & GIBBS PLLC
601 Union Street, Suite 4100
Seattle, WA 98101-2380
Telephone: (206) 628-6600
Fax: (206) 628-6611
Email: swillert@williamskastner.com

NOTICE OF APPEARANCE - 3

Williams, Kastner & Gibbs PLLC
601 Union Street, Suite 4100
Seattle, Washington 98101-2380
(206) 628-6600

3267266.1

Exhibit A – 3

E-FILED
IN COUNTY CLERK'S OFFICE
PIERCE COUNTY, WASHINGTON

**IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR PIERCE COUNTY**

August 25 2011 3:17 PM

KEVIN STOCK
COUNTY CLERK

No. 11-2-13029-6

ORDER SETTING CASE SCHEDULE

Type of case: PIN
Estimated Trial (days): 5
Track Assignment: Standard
Assignment Department: 09
Docket Code: ORSCS

Confirmation of Service	9/22/2011
Confirmation of Joinder of Parties, Claims and Defenses	12/22/2011
Jury Demand	12/29/2011
Status Conference (Contact Court for Specific Date)	Week of 1/19/2012
Plaintiff's/Petitioner's Disclosure of Primary Witnesses	2/16/2012
Defendant's/Respondent's Disclosure of Primary Witnesses	3/15/2012
Disclosure of Rebuttal Witnesses	5/3/2012
Deadline for Filing Motion to Adjust Trial Date	5/31/2012
Discovery Cutoff	7/5/2012
Exchange of Witness and Exhibit Lists and Documentary Exhibits	7/19/2012
Joint Statement of Evidence	7/26/2012
Deadline to file Certificate or Declaration re: Alternative Dispute Resolution (PCLR 16 (c)(3))	7/26/2012
Deadline for Hearing Dispositive Pretrial Motions	7/26/2012
Pretrial Conference (Contact Court for Specific Date)	Week of 8/9/2012
Trial	8/23/2012 9:00

Unless otherwise instructed, ALL Attorneys/Parties shall report to the trial court at 9:00 AM on the date of trial.

NOTICE TO PLAINTIFF/PETITIONER

If the case has been filed, the plaintiff shall serve a copy of the Case Schedule on the defendant(s) with the summons and complaint/petition: Provided that in those cases where service is by publication the plaintiff shall serve the Case Schedule within five (5) court days of service of the defendant's first response/appearance. If the case has not been filed, but an initial pleading is served, the Case Schedule shall be served within five (5) court days of filing. See PCLR 1.

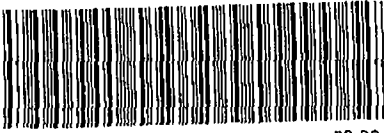
NOTICE TO ALL PARTIES

All attorneys and parties shall make themselves familiar with the Pierce County Local Rules, particularly those relating to case scheduling. Compliance with the scheduling rules is mandatory and failure to comply shall result in sanctions appropriate to the violation. If a statement of arbitrability is filed, PCLR 1 does not apply while the case is in arbitration.

Dated: August 25, 2011


Judge EDMUND MURPHY

Department 09



11-2-13029-6 37021592 ROACT 08-26-11

FILED
IN COUNTY CLERK'S OFFICEA.M. AUG 25 2011 P.M.
PIERCE COUNTY WASHINGTON
KEVIN STOCK, County Clerk
BY 4 DEPUTY

PIERCE COUNTY SUPERIOR COURT, STATE OF WASHINGTON

Ockletrce

Plaintiff(s),

vs.

Franciscan Health
System et al.

Defendant(s).

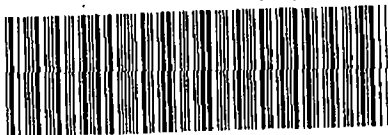
Case No. 11 2 13029 6

TRACK ASSIGNMENT REQUEST

NAME Dwayne Christopher PHONE 253-283-7489 FAX 253-5166-0129
ADDRESS 4008 S. Pine St.
Tacoma WA 98409JURY DEMAND ANTICIPATED ☒ YES ☐ NO
CONSOLIDATION ANTICIPATED ☐ YES ☒ NO
ESTIMATED LENGTH OF TRIAL 5 DAYS

TRACK ASSIGNMENT REQUESTED: SEE PCLR (g)(2)through(6)

EXPEDITED ☐ STANDARD ☒ COMPLEX ☐DISSOLUTION ☐ LUPA (Land Use Petition) ☐TRACK REQUESTS THAT DEVIATE FROM THE PRESUMED TRACK (SEE PCLR1) MUST
BE EXPLAINED ON THE SPACE PROVIDED BELOW, OR WILL BE REJECTED BY CLERK.I HEREBY CERTIFY THAT I HAVE CONSIDERED THE GENERAL GUIDELINES FOR TRACK
ASSIGNMENT AS CONTAINED HEREIN AND CERTIFY THAT MY REQUESTED TRACK IS IN
COMPLIANCE THEREWITH.DATED: 8/25/11SIGNED: [Signature]WSB#: 28892



11-2-13029-6 37021542 CICS 08-26-11

SUPERIOR COURT OF WASHINGTON FOR PIERCE COUNTY

CASE COVER SHEET / CIVIL CASES

Case Title Ocklefree v. Franciscan Case Number 11 2 13029 6
 Atty/Litigant Dwayne L. Christopher Bar # 28892 Phone 253-223-9489
 Address 4008 S. Pine St.
 City Tacoma State WA Zip 98409

Please check one category that best describes this case for indexing purposes.

Presumed tracks are listed next to the cause codes. (Non PCLR and Rev 4 indicate no Track Assignment Request is required.)

If you cannot determine the appropriate category, please describe the cause of action below. This will create a Miscellaneous cause which is not subject to PCLR 1, and does not require a Track Assignment Request Form.

APPEAL / REVIEW

- ☐ Administrative Law Review (ALR 2) REV 6
- ☐ Civil, Non-Traffic (LCA 2) REV 6
- ☐ Civil, Traffic (LCI 2) REV 6
- ☐ Land Use Petition (LUP 2) LUPA

CONTRACT / COMMERCIAL

- ☐ Breach of Contract (COM 2) REV 4
- ☐ Commercial Non-Contract (COM 2) REV 4
- ☐ Commercial-Contract (COM 2) REV 4
- ☐ Third Party Collection (COL 2) REV 4

JUDGMENT

- ☐ Judgment, Another County (ABJ 2) Non PCLR
- ☐ Abstract Only (ABJ 2) Non PCLR
- ☐ Transcript of Judgment (TRJ 2) Non PCLR
- ☐ Foreign Judgment Civil (FJU 2) Non PCLR
- ☐ Judgment, Another State (FJU 2) Non PCLR

TORT / MOTOR VEHICLE

- ☐ Death (TMV 2) STANDARD
- ☐ Non-Death Injuries (TMV 2) STANDARD
- ☐ Property Damage Only (TMV 2) STANDARD

TORT / NON MOTOR VEHICLE

- ☒ Other Malpractice (MAL 2) COMPLEX
- ☒ Personal Injury (PIN 2) STANDARD
- ☐ Property Damage (PRP 2) STANDARD
- ☐ Wrongful Death (WDE 2) STANDARD
- ☐ Other Tort (TTO 2) COMPLEX
- ☐ Products Liability (TTO 2) COMPLEX
- ☐ Asbestos (TTO 2) COMPLEX

PROPERTY RIGHTS

- ☐ Condemnation (CON 2) STANDARD
- ☐ Foreclosure (FOR 2) REV 4
- ☐ Property Fairness (PFA 2) STANDARD
- ☐ Quiet Title (QTI 2) STANDARD
- ☐ Unlawful Detainer / Eviction (UND 2) REV 4
- ☐ Unlawful Detainer / Contested (UND 2) REV 4

OTHER COMPLAINT OR PETITION

- ☐ Compel/Confirm Bind Arbitration (MSC2) REV 4
- ☐ Deposit of Surplus Funds (MSC 2) REV 4
- ☐ Interpleader (MSC 2) REV 4
- ☐ Subpoenas (MSC 2) REV 4
- ☐ Victims' Employment Leave (MSC 2) REV 4
- ☐ Wireless Number Disclosure (MSC 2) REV 4
- ☐ Injunction (INJ 2) REV 4
- ☐ Malicious Harassment (MHA 2) Non PCLR
- ☐ Minor Settlement/No Guardianship (MST2) REV 4
- ☐ Pet for Civil Commit/Sex Predator (PCC2) REV 4
- ☐ Property Damage Gangs (PRG 2) REV 4
- ☐ Seizure of Property/Comm. of Crime (SPC2) REV 4
- ☐ Seizure of Property Result from Crime (SPR2) REV 4

TORT / MEDICAL MALPRACTICE

- ☐ Hospital (MED 2) COMPLEX
- ☐ Medical Doctor (MED 2) COMPLEX
- ☐ Other Health Care Professional (MED2) COMPLEX

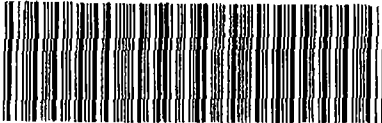
WRIT

- ☐ Habeas Corpus (WHC 2) REV 4
- ☐ Mandamus (WRM 2) REV 4
- ☐ Review (WRV 2) REV 4
- ☐ Miscellaneous Writ (WMW 2) REV 4

MISCELLANEOUS

Revised 2/16/2011 Fillable

FILED



11-2-13029-6 37021593 SM 08-26-11

PIERCE COUNTY SUPERIOR COURT
KEVIN STOCK
CLERK OF THE SUPERIOR COURT
TACOMA WA

11-2-13029-6

FILED
IN COUNTY CLERK'S OFFICE

Rcpt. Date Acct. Date Time
08/25/2011 08/26/2011 03:18 PM

A.M. AUG 25 2011 P.M.
PIERCE COUNTY WASHINGTON
KEVIN STOCK, County Clerk
BY DEPUTY

Receipt/Item # Tran-Code Docket-Code
2011-05-15130/01 1100 \$FFR
Cashier: GJW

Paid By: christopher, dwayne
Transaction Amount: \$230.00

**SUPERIOR COURT FOR THE STATE OF WASHINGTON
COUNTY OF PIERCE**

LARRY C. OCKLETREE, Individually,

Plaintiff,

No. 11 2 13029 6

SUMMONS

v.

FRANCISCAN HEALTH SYSTEM, a
Washington Corporation, d/b/a/ ST. JOSEPH
HOSPITAL; and JOHN and JANE DOE(S) (1-
10),

Defendants.

TO THE DEFENDANT:

A lawsuit has been started against you in the above entitled court by Plaintiff.
Plaintiff's claim is stated in the written Complaint, a copy of which is served upon you with
this Summons.

In order to defend against this lawsuit, you must respond to the Complaint by stating your
defense in writing, and by serving a copy upon the person signing this Summons within 20
days after the service of this Summons within the State of Washington or 60 days if served
outside of the State of Washington, excluding the day of service, or a default judgment may
be entered against you without notice. A default judgment is one where Plaintiff is entitled

SUMMONS
PAGE 1

ORIGINAL

Exhibit A - 7

DWAYNE L. CHRISTOPHER, PLLC
ATTORNEY AT LAW
4008 S. PINE ST.
TACOMA, WA 98409
PHONE-(253) 223-9489
FAX-(253) 566-0129

1 to what it asks for because you have not responded. If you serve a notice of appearance on
2 the undersigned attorney, you are entitled to notice before a default judgment may be entered.

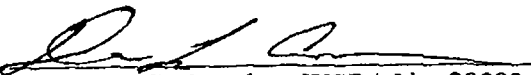
3 You may demand that the Plaintiff file this lawsuit with the court. If you do so, the demand
4 must be in writing and must be served upon the person signing this Summons. Within 14
5 days after you serve the demand, the Plaintiff must file this lawsuit with the court, or the
6 service on you of this Summons and Complaint will be void.

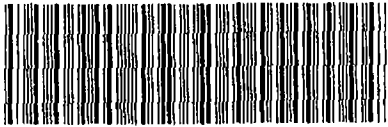
7 If you wish to seek the advice of an attorney in this matter, you should do so promptly so that
8 your written response, if any, may be served on time.

9 This Summons is issued pursuant to Rule 4 of the Superior Court Civil Rules of the State of
10 Washington.

11 Dated this 25th day of August, 2011.

12 DWAYNE L. CHRISTOPHER, PLLC

13
14 By 
15 Dwayne L. Christopher, WSBA No. 28892
16 Attorney for Plaintiff
17 dwayne@dlclawgroup.com
18
19
20
21
22
23



11-2-13029-6 37021594 CMP 08-26-11

FILED
IN COUNTY CLERK'S OFFICEA.M. AUG 25 2011 P.M.
PIERCE COUNTY WASHINGTON
KEVIN STOCK, County Clerk
BY _____ DEPUTY

**SUPERIOR COURT FOR THE STATE OF WASHINGTON
COUNTY OF PIERCE**

LARRY C. OCKLETREE, Individually,
Plaintiff,

No. 11 2 13029 6
COMPLAINT FOR DAMAGES

v.

FRANCISCAN HEALTH SYSTEM, a
Washington Corporation, d/b/a/ ST. JOSEPH
HOSPITAL; and JOHN and JANE DOE(S) (1-
10),
Defendants.

COMES NOW the Plaintiff, by and through his attorneys of record Dwayne L. Christopher,
Attorney at Law in the above-entitled matter to allege and complain as follows:

I. INTRODUCTION

1.1 This lawsuit is for damages against Franciscan Health System d/b/a St. Joseph
Hospital Hospital and John and Jane Doe(s)(1-10), and is brought under all tort claims available
under statute and the common law.

COMPLAINT FOR DAMAGES
PAGE 1

ORIGINAL

Exhibit A - 9

DWAYNE L. CHRISTOPHER, PLLC
ATTORNEY AT LAW
4008 S. PINE ST.
TACOMA, WA 98409
PHONE-(253) 223-9489
FAX- (253) 566-0129

II. JURISDICTION AND VENUE

2.1 This Court has personal and subject matter jurisdiction over this matter as all tortious and discriminatory acts complained of herein occurred in Pierce County, Washington.

2.2 This suit is brought, in part, pursuant to 42 U.S.C. § 1981; 42 U.S.C. § 12132; Title VII of the Civil Rights Act of 1964; and the Americans with Disabilities Act.

2.3 The events giving rise to this lawsuit occurred in Pierce County, Washington. Venue is proper in this Court.

III. PARTIES

3.1 Plaintiff is a disabled African American male and a resident of Pierce County, Washington. The Plaintiff has filed a discrimination charge with the United States Equal Employment Opportunity Commission and has since received a Notice of Right to Sue letter

3.2 Defendant Franciscan Health System d/b/a St. Joseph Hospital, is a Washington Corporation doing business in Pierce County, Washington. St. Joseph Hospital is the Plaintiff's former employer.

3.3 Defendant(s) John and Jane Doe (1-10) are yet to be identified managers, supervisors, employees, agents and/or assigns of Defendant St. Joseph Hospital.

IV. FACTS

4.1 This claim arises as a result of the wrongful, tortuous, and discriminatory acts and/or omissions committed against the Plaintiff by Defendant(s) due to or substantially due to Plaintiff's disability and/or race.

1 4.2 Plaintiff is a disabled African American male, a former law enforcement officer, and
2 a former employee of St. Joseph Hospital.

3 4.3 Plaintiff began his employment with St. Joseph Hospital as a contract security officer.

4 4.4 Plaintiff provided St. Joseph Hospital with excellent job performance for years and
5 throughout his tenure as a contract security officer, receiving numerous awards and
6 commendations for his service to the organization.

7 4.5 In December 2009, St. Joseph Hospital converted Plaintiff's security officer position
8 from a contract position to a permanent in-house position and hired Plaintiff as a St. Joseph
9 Hospital employee.

10 4.6 Plaintiff performed his job duties with excellence throughout his employment with St.
11 Joseph Hospital.

12 4.7 On March 9, 2010, Plaintiff suffered an on-the-job stroke requiring him to be
13 hospitalized.

14 4.8 Plaintiff's stroke resulted in permanent disability to his left arm and limited use of his
15 left arm and hand.

16 4.9 Plaintiff was released to return to work by his doctor on or about April 23, 2010.

17 4.10 Despite Plaintiff's disabled left arm and hand, Plaintiff was capable of performing his
18 job duties as a security officer with or without reasonable accommodations.

19 4.11 On or about April 23, 2010, Plaintiff presented to St. Joseph Hospital with a doctor's
20 note releasing him to return to work.

21 4.12 On or about April 23, 2010, Plaintiff requested that St. Joseph Hospital permit him to
22 return to work.

1 4.13 St. Joseph Hospital refused to allow Plaintiff to return to work despite the fact that
2 Plaintiff was capable of performing his job duties with or without reasonable accommodations.

3 4.14 Plaintiff requested that St. Joseph Hospital make reasonable accommodations for his
4 disability and St. Joseph Hospital refused.

5 4.15 St. Joseph Hospital told Plaintiff that if it made reasonable accommodations for him,
6 it would be required to make accommodations for all employees.

7 4.16 St. Joseph Hospital has made reasonable accommodations for disabled non-African
8 American employees.

9 4.17 St. Joseph Hospital filled open positions that Plaintiff was qualified to fill with or
10 without reasonable accommodations during the time Plaintiff was out on non-paid medical
11 leave and failed to offer said positions to Plaintiff prior to terminating his employment.

12 4.18 St. Joseph Hospital filled open positions that Plaintiff was qualified to fill with non-
13 disabled individuals during the time St. Joseph Hospital refused to allow Plaintiff to return to
14 work.

15 4.19 St. Joseph Hospital filled open positions that Plaintiff was qualified to fill with non-
16 African American individuals during the time St. Joseph Hospital refused to allow Plaintiff to
17 return to work.

18 4.20 St. Joseph Hospital failed to promote Plaintiff to positions within its organization in
19 favor of less qualified non-African American individuals.

20 4.21 St. Joseph Hospital unlawfully and tortuously terminated Plaintiff's employment on
21 or about September 10, 2010.

V. CAUSES OF ACTION

1 **5.1 Violation of the Americans with Disabilities Act:** Plaintiff incorporates all prior
2 assertions in this Complaint as the proximate cause of plaintiff's injuries. Plaintiff will bring
3 claims for racial and disability discrimination, including but not limited to, hostile work
4 environment, disparate treatment, disparate impact, retaliation, racial discrimination, disability
5 discrimination, failure to reasonably accommodate disability, and constructive and/or actual
6 discharge.

7 **5.2 Violation of Title VII of the Civil Rights Act of 1964:** Plaintiff incorporates all
8 prior assertions in this Complaint as the proximate cause of plaintiff's injuries. Plaintiff will
9 bring claims for racial and disability discrimination, including but not limited to, hostile work
10 environment, disparate treatment, disparate impact, retaliation, racial discrimination, disability
11 discrimination, failure to reasonably accommodate disability, and constructive and/or actual
12 discharge.

13 **5.3 Violation of 42 U.S.C. § 1981:** Plaintiff incorporates all prior assertions in this
14 Complaint as the proximate cause of plaintiff's injuries.

15 **5.4 Disability Discrimination in Violation of Public Policy and the Common Law:**
16 Plaintiff incorporates all preceding paragraphs as though fully set forth herein as a proximate
17 cause of Plaintiff's injuries. Although Plaintiff states an individual cause of action, Plaintiff
18 notes that each cause of action is interrelated to all of the facts set forth in this complaint.

19 **5.5 Racial Discrimination in Violation of Public Policy and the Common Law:**
20 Plaintiff incorporates all preceding paragraphs as though fully set forth herein as a proximate
21 cause of Plaintiff's injuries. Although Plaintiff states an individual cause of action, Plaintiff
22 notes that each cause of action is interrelated to all of the facts set forth in this complaint.
23

1 **5.6 Hostile Work Environment (Disability & Race) in Violation of Public Policy and**
 2 **the Common Law:** Plaintiff incorporates all preceding paragraphs as though fully set forth
 3 herein as a proximate cause of Plaintiff's injuries. Although Plaintiff states an individual cause
 4 of action, Plaintiff notes that each cause of action is interrelated to all of the facts set forth in
 5 this complaint.

6 **5.7 Disparate Treatment (Disability & Race) in Violation of Public Policy and the**
 7 **Common Law:** Plaintiff incorporates all preceding paragraphs as though set forth fully herein
 8 as a proximate cause of Plaintiff's injuries. Although Plaintiff states an individual cause of
 9 action, Plaintiff notes that each cause of action is interrelated to all of the facts set forth in this
 10 complaint.

11 **5.8 Disparate Impact (Disability & Race) in Violation of Public Policy and the**
 12 **Common Law:** Plaintiff incorporates all preceding paragraphs as though set forth fully herein
 13 as a proximate cause of Plaintiff's injuries. Although Plaintiff states an individual cause of
 14 action, Plaintiff notes that each cause of action is interrelated to all of the facts set forth in this
 15 complaint.

16 **5.9 Unlawful Retaliation (Disability & Race) in Violation of Public Policy and the**
 17 **Common Law:** Plaintiff incorporates all preceding paragraphs as though set forth fully herein
 18 as a proximate cause of Plaintiff's injuries. Although Plaintiff states an individual cause of
 19 action, Plaintiff notes that each cause of action is interrelated to all of the facts set forth in this
 20 complaint.

21 **5.10 Unlawful Actual and/or Constructive Discharge (Disability & Race) in Violation**
 22 **of Public Policy and the Common Law:** Plaintiff incorporates all preceding paragraphs as
 23 though set forth fully herein as a proximate cause of Plaintiff's injuries. Although Plaintiff states

1 an individual cause of action, Plaintiff notes that each cause of action is interrelated to all of the
2 facts set forth in this complaint.

3 5.11 **Tortious Interference with Business Relations/Expectancy:** Plaintiff incorporates
4 all preceding paragraphs as though set forth fully herein as a proximate cause of Plaintiff's
5 injuries. Although Plaintiff states an individual cause of action, Plaintiff notes that each cause
6 of action is interrelated to all of the facts set forth in this complaint.

7 5.12 **Negligence, Negligent Infliction of Emotional Distress, Hiring, Training,**
8 **Supervision, and Retention:** Plaintiff incorporates all preceding paragraphs as though set forth
9 fully herein as a proximate cause of Plaintiff's injuries. Although Plaintiff states an individual
10 cause of action, Plaintiff notes that each cause of action is interrelated to all of the facts set forth
11 in this complaint.

12 5.13 **Intentional Infliction of Emotional Distress, Outrage:** Plaintiff incorporates all
13 preceding paragraphs as though set forth fully herein as a proximate cause of Plaintiff's injuries.
14 Although Plaintiff states an individual cause of action, Plaintiff notes that each cause of action
15 is interrelated to all of the facts set forth in this complaint.

16 VI. DAMAGES

17 6.1 Plaintiff incorporates all preceding paragraphs as though fully set forth herein.

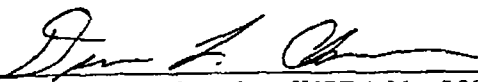
18 6.2 As a direct and proximate result of Defendant(s) wrongful, tortious, negligent,
19 discriminatory, public policy violations, and retaliatory acts and/or omissions, Plaintiff has
20 sustained economic and non-economic damages, the amount, nature and extent of which are
21 unknown at this time but which will be set forth prior to trial.
22
23

VII. PRAYER FOR RELIEF

1 7.1 WHEREFORE, Plaintiff prays that the Court enter judgment against the Defendants,
2 jointly and severally, for general and special damages as allowed by law, punitive damages as
3 allowed by law, attorneys' fees and costs incurred in maintaining this action, and for
4 prejudgment interest and such other relief as the Court may deem just.
5

6 Dated this 25th day of August, 2011.
7

8 DWAYNE L. CHRISTOPHER, PLLC
9

10 By 
11 Dwayne L. Christopher, WSBA No. 28892
12 Attorney for Plaintiff
13 dwayne@dlclawgroup.com
14
15
16
17
18
19
20
21
22
23



11-2-13029-6 37180109 CS 09-23-11

FILED
IN COUNTY CLERK'S OFFICE

A.M. SEP 22 2011 P.M.

PIERCE COUNTY, WASHINGTON
KEVIN STOCK, County Clerk
BY _____ DEPUTY

4

SUPERIOR COURT OF WASHINGTON FOR PIERCE COUNTY

Ockletree

v.

Franciscan Health

NO. 11-2-13029-6

CONFIRMATION OF SERVICE
(CS / CSSRV)

CS ☒ All the named defendants/petitioners/respondents have been served, have joined or have accepted service in writing. (Check if appropriate, otherwise check the box below)

CSSRV ☐ One or more named defendants have not yet been served.
(If this box is checked, an additional confirmation of service must be filed pursuant to subsection (b) when service is obtained and the following information must be provided.)

The following defendants have been served or have joined or accepted service.

The following defendants have not yet been served.

Reasons why service has not yet been obtained:

How service will be obtained:

Date by which service is expected to be obtained:

No other named defendants remain to be served.

A status conference is requested regarding

Family Law Cases only (PCLR 40(d)): The following petitioner/respondent has been served or accepted service of the Order Assigning Case to Department: _____

If Service has not been made, state the reasons why and the date by which service will be accomplished _____

Date: 9/22/11

Attorney or Party

WS Bar # 28892